



July 1, 2010

Kathleen Harper
Executive Director
DOVES of Big Bear Valley
PO Box 3646
Big Bear Lake, Ca 92315

SUBJECT: Performance Assessment Report
GRANT #: DV09181482 & DR0901482
RECIPIENT NAME: DOVES of Big Bear Valley

Dear Ms. Strong,

Thank you again for your time on June 28, 2010, when I conducted a Performance Assessment of the Domestic Violence Assistance (DV) Program grant for your agency. Attached please find a copy of the Performance Assessment including the Domestic Violence Recovery Act (DR) Addendum.

During the site visit, we discussed Cal EMA's requirements for the project, the goals and objectives of the program, the project's source documentation, and the reporting requirements. As a result of the visit, I have identified the following areas which need corrective action.

California Environmental Quality Act (CEQA)

Finding: Current CEQA documentation was not on file.

Citation: Recipient Handbook Section 2153 requires all Cal EMA funded projects to certify compliance with CEQA. A copy of the CEQA compliance memo or other certification must be completed once during the project's grant award cycle. The original copy must be retained on file for review during site and monitoring visits by Cal EMA staff.

Corrective Action: The project must obtain verification of compliance with CEQA or otherwise exemption from CEQA and submit copy to Cal EMA by **January 1, 2011**.

Comment: Contact your city or county planning department to have them prepare an environmental document stating whether the project will have a significant effect on the environment.

Client Confidentiality

Current Policy: Current Policy for client confidentiality establishes the boundaries of confidentiality and protocols for handling confidential client files up until the point of long term storage. No written policy exists for the eventual destruction of files, nor does a policy specifically identify the time period long term files should be kept.

Citation: Both the Victims Of Crime Act and the Family Violence Prevention Act contain provisions protecting the confidentiality of victims. Specifically, 42 U.S.C. 10402 (a)(2)(E)

authorizes the state to ensure documented procedures have been developed and implemented (to include policies and procedures) "to assure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services by any program assisted under this chapter..."

Recommendation: While documented protocols exist up until the point of long-storage, no protocol exists for the handling of client files during or after that period. Written protocols should be established for the long-term storage of and eventual destruction of client files, in order to protect against the dissemination of confidential client information. Evidence of the development of a written policy should be submitted to Cal EMA no later than **January 1, 2011**.

Fidelity Bond

Finding: A copy of the Fidelity Bond was not on file with the agency. The agency did not know whether they had coverage for employee theft and forgery.

Citation: Recipient Handbook, Fidelity Bond, Section 2160, requires recipients to obtain a fidelity bond or an equivalent employee dishonesty insurance contract in an amount equal to 50 percent of the total grant award, less matching funds. Section 2161.2 indicates the Fidelity Bond must include Form A, Employee Dishonesty, and Form B, Forgery Coverage. The Fidelity Bond must provide blanket coverage of all employees; a scheduled bond is not acceptable. Further, Section 2161.4 states the certificate holder or first loss payee must be the State of California, Emergency Management Agency. The grant numbers for each grant covered must be included.

Corrective Action: See Recipient Handbook Section 2160, Certificate of Insurance, for the components that must be included in the certificate. Documentation from an insurance carrier that verifies the grant recipient is in compliance with this requirement must be submitted to Cal EMA by **January 1, 2011**.

As for the other documentation that you were required to provide at the time of the site visit, I will be placing copies in your DV09/10 file and your master file at Cal EMA headquarters.

Enclosed is a copy of the completed Site Visit Checklist Form for your review. Please sign the cover page and return a copy of the page to me by **Monday August 2, 2010 or sooner** as confirmation of receipt.

Thank you again for your hospitality during this visit. If you have any questions regarding the site visit please contact me at 916.324.9104 or Jason.Stalder@calema.ca.gov.

Jason Stalder
Criminal Justice Specialist
Domestic Violence Section

Enclosures

C: Cal EMA R&R Logistics

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